

NOV 05 2014

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America)

v.)

Edward Eliseo MARRON)

Case No. C-14-1186M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 11/4/2014 in the county of Kleberg in the
Southern District of Texas, the defendant(s) violated:

Code Section

21 USC 841(a)(1)

Offense Description

Knowingly, intentionally and unlawfully
possess with intent to distribute a
controlled substance in Schedule 1 of
the Controlled Substance Act of 1970, to
wit, 48.2 kilograms marijuana (AGW)

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

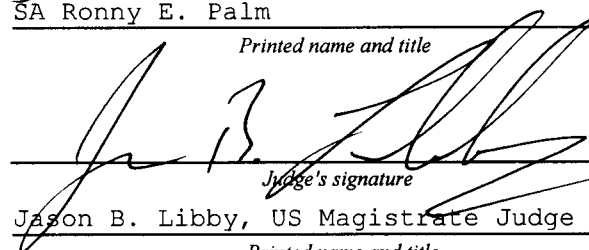
Sworn to before me and signed in my presence.

Date: November 5, 2014City and state: Corpus Christi, Texas

Complainant's signature

SA Ronny E. Palm

Printed name and title



Judge's signature

Jason B. Libby, US Magistrate Judge

Printed name and title

ATTACHMENT A

Edward Eliseo MARRON

On November 4, 2014, US Border Patrol Agent Gustavo Villarreal was assigned checkpoint duties at the Sarita, Texas Border Patrol Checkpoint. Assisting him with his primary inspection duties was BPA Braulio Morales and his service canine Rex-xx.

At approximately 11:10 am, a 1998 green in color Ford Explorer bearing Texas license plate number DD3 V636 (the Load Vehicle) entered the primary inspection lane. As the Load Vehicle came to a stop, BPA Villarreal identified himself as a Border Patrol Agent and questioned the driver, later identified as Edward Eliseo MARRON, as to his citizenship. While doing so, BPA Morales and his service canine performed a non-intrusive free air sniff of the exterior of the Load Vehicle. MARRON stated that he was a US citizen and that he was born in Houston, Texas. BPA Villarreal asked MARRON if he was the registered owner of the Load Vehicle and MARRON replied that he was not, that he borrowed the Load Vehicle from a friend. BPA Villarreal asked MARRON as to the purpose of his trip. MARRON stated that he drove from Houston to purchase a pair of boxing gloves because he was going to start MMA fighting. BPA Villarreal asked MARRON why he drove from Houston to the Rio Grande Valley to purchase the gloves when there were twice as many stores in the Houston area, and MARRON replied that he also wanted to kill a little time. In response to questioning by BPA Villarreal, MARRON stated that he arrived in the Rio Grande Valley the day before his arrest, that he had family in the area but that he stayed in a hotel because there were too many people already staying at the family residence. BPA Villarreal observed that MARRON had no luggage with him or any other articles to indicate an overnight trip. During questioning, MARRON appeared to be over friendly and wanted to elaborate on every question asked by BPA Villarreal.

BPA Morales then informed BPA Villarreal that his service canine was alerting to the Load Vehicle. BPA Villarreal asked MARRON for consent to perform a closer inspection of his Load Vehicle in the secondary inspection area and MARRON consented. While in the secondary inspection area, BPA Villarreal discovered that all four tires were loaded with a green leafy substance determined to be marijuana. A total of 24 bundles of marijuana with an aggregate gross weight of 48.2 kilograms were seized from metal casings in each of the four tires. MARRON was then arrested for possession of a controlled substance. MARRON was read his Miranda Warnings in the English language by BPA Teodolo Ruiz and witnessed by BPA Villarreal. MARRON signed in the appropriate place indicating that he understood his rights and also refused to answer any questions at that time.

On November 4, 2014, DEA Corpus Christi Resident Office SA Ronny E. Palm and TFO Todd Beach arrived at the Sarita, Texas U.S. Border Patrol Checkpoint to conduct the investigation. SA Palm, as witnessed by TFO Beach, advised Edward Eliseo MARRON of his rights via Form DEA-13. MARRON acknowledged both verbally and in writing that he understood his rights and stated that he was willing to answer questions at that time without the presence of an attorney. MARRON denied knowing that he was transporting a quantity of marijuana. MARRON however changed the information he previously provided to the US Border Patrol. MARRON stated that Felix AGUILAR, an acquaintance of his and the registered owner of the

Load Vehicle, asked MARRON to drive a vehicle from Brownsville, Texas to Houston, Texas and that MARRON would be paid \$1,000. MARRON agreed. AGUILAR drove MARRON to Brownsville, Texas on the evening of November 3, 2014. They drove to the southern end of Highway 77, just before the US Mexico border, where the Load Vehicle was parked on the side of the road. MARRON got into the Load Vehicle and drove to the Sarita Checkpoint, at which time he was arrested.

Previously, on September 26, 2014, MARRON was also arrested at the Sarita Border Patrol Checkpoint for possession of 16 bundles of marijuana with an aggregate gross weight of 25.24 kilograms. The marijuana was seized from metal casings in each of the four tires of the vehicle being driven by MARRON.

AUSA Kenneth Cusick approved federal prosecution of Edward Eliseo MARRON. MARRON was transported to the Coastal Bend Detention Center in Robstown, Texas for overnight detention pending further judicial proceedings.

The amount of marijuana seized implies the intent to distribute.